

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TREVOR KEVIN BAYLIS,

Plaintiff,

v.

VALVE CORPORATION,

Defendant.

Case No. 2:23-cv-01653-RSM

PLAINTIFF

TREVOR KEVIN BAYLIS

**REPLY IN SUPPORT OF REQUEST
FOR JUDICIAL NOTICE UNDER
RULE 201**

Filed: 22th March 2024

1. INTRODUCTION

In their RESPONSE by Defendant Valve Corporation re32 Notice-Other to Request for Judicial Notice Pursuant to ER 201(e) (Dkt. #34) (“Objection”) Valve ask the court to be given the opportunity to be heard on the propriety of taking judicial notice and the nature of the facts to be noticed.

2. ARGUMENT

A. Iron Sky Film was first published in Germany at the Berlin Film Festival on 11th February 2012 and this cannot be reasonably disputed.

Under Rule 201, facts appropriate for judicial notice are those that are (1) “not subject to reasonable dispute” in that they (2) are “capable of accurate and ready

determination by resort to sources whose accuracy cannot be reasonably questioned.”

Federal rules of evidence 201(b).

Valve’s Objection cannot be sustained because the sources provided in the Baylis’ Judicial notice are sources whose accuracy cannot be reasonably questioned. Additionally, a judge is unrestricted in researching facts for themselves and whilst Baylis has provided four sources of information relating to the first publication of Iron Sky in Germany at the Berlin Film Festival on 11th February 2012, there are many more sources available which a judge can, by their own discretion seek out, and the unquestionable fact remains that Iron Sky was first published in Germany at the Berlin Film Festival on 11th February 2012, and there is no impropriety for the court in noticing such things as they are facts that relate to the case at hand and not subject to reasonable dispute.

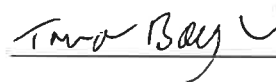
3. CONCLUSION

This Reply is respectfully made in support of Plaintiff’s in Support of Request for Judicial Notice under rule 201, Dkt. 32.

I hereby certify that, to the best of my knowledge, the provided information is true and accurate.

22nd March 2024

Trevor Kevin Baylis

A handwritten signature in black ink, appearing to read "Trevor Baylis", is written over a horizontal line.

Jankanraitti

Tampere 33560, FINLAND

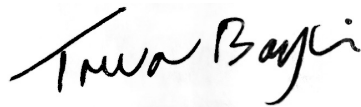
CERTIFICATE OF SERVICE FORM
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I hereby certify that on 22 March 2024 I electronically filed the foregoing document
with the United States District Court
Western District of Washington at Seattle by using the
CM/ECF system. I certify that the following parties or their counsel of
record are registered as ECF Filers and that they will be served by the
CM/ECF system:

Jeremy E Roller: jroller@aretelaw.com,
jfisher@aretelaw.com,
kgreenberg@aretelaw.com

Jonah O. Harrison: jharrison@aretelaw.com,
jfisher@aretelaw.com,
kgreenberg@aretelaw.com

Dated: 22nd March 2024



Trevor Kevin Baylis

Jankanraitti

Tampere 33560, FINLAND